IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF VIRGINIA

Richmond Division

Michael C. Burt

Case No. 09-36136-KRH
Chapter 13

DEBTOR'S ANSWER TO GMAC INC'S OBJECTON TO CONFIRMATION OF CHAPTER 13 PLAN

Now comes the Debtor in this matter, by counsel, and as and for his answer to the Objection of GMAC, Inc. (hereinafter "GMAC") confirmation of Debtor's Chapter 13 Plan filed on November 14, 2008, says as follows:

- 1. That the valuation of the vehicle at \$19,000.00 is reasonable based on its present condition.
- 2. That the following repairs and or maintenances needs to be done to the vehicle:
 - a. Windshield replacement \$284.19
 - b. Body Work \$2,724.16
 - c. Replace missing hub cap \$83.21
 - d. Replace worn tires \$913.20
 - e. Perform required 60,000 mile service \$764.95

WHEREFORE, Debtor respectfully moves the Court that the Objection to Confirmation to his Chapter 13 Plan be denied.

Respectfully submitted: Michael C. Burt

BY: <u>/s/ Linda D. Jennings</u> Linda D. Jennings, Counsel

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Certificate of Service

I certify that on the 20th day of November, 2009, a copy of the foregoing Answer was delivered by first class mail, postage prepaid, via e-mail or fax to the following parties:

Carl A. Eason, Esquire Wolcott Rivers Gates Covergence Center IV 301 Bendix Road, Suite 500 Virginia Beach, VA 23452